

IN THE
UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
AT CHARLOTTESVILLE
AUGUST 2003 SESSION

CLERK'S OFFICE U.S. DIST. COURT
AT CHARLOTTESVILLE, VA
FILED

AUG 07 2003

JOHN F. SOROCORAN, CLERK
BY: *B. K. [Signature]*
DEPUTY CLERK

UNITED STATES OF AMERICA :
 :
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 v. :
 :
 :
 MARLON DALE DANIEL, :
 aka MARLON DALE DANIELS; :
 ALONZO WILLIAM TRICE, :
 aka DODO; :
 GREGORY ANTONIO BATES FELTON, :
 aka CAPONE; :
 TADASHI DEMETRIUS KEYES, :
 aka CALICO; :
 JAMES ALLEN CAIN III, :
 aka ROCK; :
 MICHELLE BENITA CAMPBELL; and :
 TODD MAURICE JONES. :

Criminal No. 3:03CR00008

S U P E R S E D I N G I N D I C T M E N T

Count One

The Grand Jury charges:

That from a date not known to the Grand Jury, but within or about September, 1998, and continuing thereafter until January 16, 2003, in the Western Judicial District of Virginia, and elsewhere, the defendants, MARLON DALE DANIEL, ALONZO WILLIAM TRICE, GREGORY ANTONIO BATES FELTON, TADASHI DEMETRIUS KEYES, JAMES ALLEN CAIN III, MICHELLE BENITA CAMPBELL, and TODD MAURICE JONES, did knowingly combine, conspire, confederate, and agree, with each other and with other persons, both known and unknown to the Grand Jury, to knowingly and intentionally: (a) distribute and possess with the intent to distribute 50 grams, or more, of a mixture or

"crack," a Schedule II controlled substance; and (b) distribute and possess with the intent to distribute marijuana, in violation of Title 21, United States Code, Section 841(a)(1).

Objects of the Conspiracy

It was the primary object of this conspiracy that MARLON DALE DANIEL, ALONZO WILLIAM TRICE, GREGORY ANTONIO BATES FELTON, TADASHI DEMETRIUS KEYES, JAMES ALLEN CAIN III, MICHELLE BENITA CAMPBELL, and TODD MAURICE JONES, and others, assumed various roles and responsibilities and participated on different levels to smuggle, transport, temporarily store, and, ultimately, distribute, significant quantities of cocaine base and marijuana in the Western District of Virginia and elsewhere.

It was another object of the conspiracy for MARLON DALE DANIEL, ALONZO WILLIAM TRICE, GREGORY ANTONIO BATES FELTON, TADASHI DEMETRIUS KEYES, JAMES ALLEN CAIN III, MICHELLE BENITA CAMPBELL, and TODD MAURICE JONES, and others, to arrange for, facilitate, and coordinate, the delivery of cocaine base and marijuana to the Western District of Virginia and elsewhere.

It was another object of the conspiracy that MARLON DALE DANIEL, ALONZO WILLIAM TRICE, GREGORY ANTONIO BATES FELTON, TADASHI DEMETRIUS KEYES, JAMES ALLEN CAIN III, MICHELLE BENITA CAMPBELL, and TODD MAURICE JONES, and others, would arrange for the collection of proceeds from the sale of illegal narcotics, and the redistribution of the proceeds in the form of fees, expenses, and other forms of reimbursement to the participants in the conspiracy.

It was another object of the conspiracy that MARLON DALE DANIEL, ALONZO WILLIAM TRICE, GREGORY ANTONIO BATES FELTON, TADASHI DEMETRIUS KEYES, JAMES ALLEN CAIN III, MICHELLE BENITA CAMPBELL, and TODD MAURICE JONES, and others, would profit, on different levels and in different forms, from the smuggling, transportation, temporary storage, and distribution, of cocaine base and marijuana.

Manner and Means of the Conspiracy

Among the manner and means used by members of this conspiracy to carry out and achieve the objectives of the conspiracy were the following:

1. It was a part of the conspiracy that the members of the conspiracy maintained, employed, and associated with, various sources of supply of cocaine base in the Charlottesville, Virginia, area, in the Western District of Virginia, and in the New York, New York, area.
2. That it was further part of the conspiracy that some members of the conspiracy would travel from New York, New York, and surrounding areas, to the Western District of Virginia to deliver illegal narcotics to MARLON DALE DANIEL, ALONZO WILLIAM TRICE, GREGORY ANTONIO BATES FELTON, TADASHI DEMETRIUS KEYES, JAMES ALLEN CAIN III, MICHELLE BENITA CAMPBELL, and TODD MAURICE JONES, and others.
3. That it was further part of the conspiracy that some members of the conspiracy would travel to the Western District of

Virginia from the New York, New York, area, and surrounding areas, to collect proceeds from MARLON DALE DANIEL, ALONZO WILLIAM TRICE, GREGORY ANTONIO BATES FELTON, TADASHI DEMETRIUS KEYES, JAMES ALLEN CAIN III, MICHELLE BENITA CAMPBELL, and TODD MAURICE JONES, and others, for the distribution of illegal narcotics in the Western District of Virginia.

4. That it was further part of the conspiracy that some members of the conspiracy including MARLON DALE DANIEL, ALONZO WILLIAM TRICE, GREGORY ANTONIO BATES FELTON, TADASHI DEMETRIUS KEYES, JAMES ALLEN CAIN III, MICHELLE BENITA CAMPBELL, and TODD MAURICE JONES, and others, would utilize and employ others for the smuggling of, transport of, storage of, distribution of, and the collection of proceeds from the sale of, illegal narcotics.

5. That it was further part of the conspiracy that MARLON DALE DANIEL, ALONZO WILLIAM TRICE, GREGORY ANTONIO BATES FELTON, TADASHI DEMETRIUS KEYES, JAMES ALLEN CAIN III, MICHELLE BENITA CAMPBELL, and TODD MAURICE JONES, and others, maintained a customer base and clients in the Charlottesville, Virginia, area, and elsewhere, for the distribution of cocaine base.

6. That it was further part of the conspiracy that some members of the conspiracy, including ALONZO WILLIAM TRICE, GREGORY ANTONIO BATES FELTON, TADASHI DEMETRIUS KEYES, and JAMES ALLEN CAIN III, and others, used various firearms to protect and facilitate their illegal narcotics trafficking activities.

7. That it was further part of the conspiracy that some members of the conspiracy, including ALONZO WILLIAM TRICE and GREGORY ANTONIO BATES FELTON, used a number of vicious dogs, including pit-bulls, that were trained to attack anyone who came near ALONZO WILLIAM TRICE'S house and grounds located at 854 Estes Street, Charlottesville, Virginia. These attack dogs, which usually roamed free in the fenced yard of 854 Estes Street, were employed to protect the illegal narcotics that members of this conspiracy maintained at this address.

8. That it was further part of the conspiracy that some members of the conspiracy, including ALONZO WILLIAM TRICE, GREGORY ANTONIO BATES FELTON, TADASHI DEMETRIUS KEYES, and TODD MAURICE JONES, and others, maintained and protected an open-air drug market on Estes Street in Charlottesville, Virginia, for the purpose of selling and storage of illegal narcotics as well as other illegal narcotics distribution activities. This market was protected by the members of the conspiracy through the use of violence and intimidation of both the customers of the illegal narcotics and other local residents.

Overt Acts of the Conspiracy

In furtherance of this conspiracy, and to effect and accomplish the objects thereof, MARLON DALE DANIEL, ALONZO WILLIAM TRICE, GREGORY ANTONIO BATES FELTON, TADASHI DEMETRIUS KEYES, JAMES ALLEN CAIN III, MICHELLE BENITA CAMPBELL, and TODD MAURICE JONES, and other conspirators committed, among others, the following overt

acts within the Western District of Virginia, or elsewhere:

1. That on or about June 10, 2002, JAMES ALLEN CAIN III, did knowingly and intentionally possess with the intent to distribute five grams, or more, of cocaine base, a Schedule II controlled substance.

2. That on or about June 10, 2002, JAMES ALLEN CAIN III, did knowingly and intentionally possess with the intent to distribute marijuana, a Schedule I controlled substance.

3. That on or about July 11, 2002, ALONZO WILLIAM TRICE, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

4. That on or about July 17, 2002, ALONZO WILLIAM TRICE, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

5. That on or about July 19, 2002, ALONZO WILLIAM TRICE, did knowingly and intentionally distribute five grams, or more, of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

6. That on or about September 14, 2002, GREGORY ANTONIO BATES FELTON, murdered Gerald Andrew Michie in furtherance of the drug conspiracy described herein.

7. That on or about October 27, 2002, GREGORY ANTONIO BATES

FELTON, did, as a principal, and as an aider and abettor, shoot a firearm into a residence with the intent to intimidate a witness to a homicide committed by GREGORY ANTONIO BATES FELTON.

8. That on or about November 15, 2002, MICHELLE BENITA CAMPBELL, did knowingly and intentionally possess with the intent to distribute five grams, or more, of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 846.

Count Two

The Grand Jury charges:

That from a date not known to the Grand Jury, but within or around August, 2000, in the Western Judicial District of Virginia, the defendants, ALONZO WILLIAM TRICE and GREGORY ANTONIO BATES FELTON, did, as principals, and as aiders and abettors, knowingly possess a firearm in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, as charged in Count One, which is incorporated by reference herein.

All in violation of Title 18, United States Code, Sections 2 and 924(c)(1).

Count Three

The Grand Jury charges:

That on or about July 4 or 5, 2001, in the Western Judicial District of Virginia, the defendant, GREGORY ANTONIO BATES FELTON, knowingly possessed a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, as charged in Count One, which is incorporated by reference herein.

All in violation of Title 18, United States Code, Section 924(c)(1).

Count Four

The Grand Jury charges:

That on or about August 30, 2002, in the Western Judicial District of Virginia, the defendants, GREGORY ANTONIO BATES FELTON and TADASHI DEMETRIUS KEYES, did, as principals, and as aiders and abettors, knowingly possess, carry, and use, a firearm in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, as charged in Count One, which is incorporated by reference herein.

All in violation of Title 18, United States Code, Sections 2 and 924(c)(1).

Count Five

The Grand Jury charges:

That on or about September 14, 2002, in the Western Judicial

District of Virginia and elsewhere, the defendant GREGORY ANTONIO

BATES FELTON, did knowingly carry and use a firearm, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, as charged in Count One of this Indictment, which is incorporated by reference herein, in violation of Title 18, United States Code, Section 924(c)(1); and in the course of this violation caused the death of a person through the use of a firearm, which killing was a murder as defined in Title 18, United States Code, Section 1111, in that the defendant, with malice aforethought, did unlawfully kill Gerald Andrew Michie by shooting him, deliberately, maliciously, and with premeditation.

All in violation of Title 18, United States Code, Sections 924(c)(1); 924(j); and 1111.

Count Six

The Grand Jury charges:

That on or about October 27, 2002, in the Western Judicial District of Virginia, the defendant, GREGORY ANTONIO BATES FELTON, did, as a principal, and as an aider and abettor, knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, as charged in Count One, which is incorporated by reference herein.

All in violation of Title 18, United States Code, Sections 2 and 924(c)(1).

A TRUE BILL, this 7 day of August, 2003.

Galetha H. Humberg

FOREMAN

John L. Brownlee / by W.F.D.

JOHN L. BROWNLEE

UNITED STATES ATTORNEY